

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	DATE FILED: _____
	:	
v.	:	CRIMINAL NO.: <u>03-14</u>
	:	
MAURICIO ROJAS,	:	VIOLATIONS:
a/k/a Maurice Rojas	:	21 U.S.C. § 846
JORGE ALDEA,	:	(Conspiracy to distribute more
a/k/a “Fat George”	:	than five kilograms of cocaine -
NAYDIA ROJAS	:	1 count)
MARILYN ROJAS	:	21 U.S.C. § 853
	:	(Criminal forfeiture)

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From in or about 1995 through in or about 2000, at Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, the defendants

**MAURICIO ROJAS,
a/k/a Maurice Rojas, and
JORGE ALDEA,
a/k/a/ “Fat George”
NAYDIA ROJAS
MARILYN ROJAS**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute in excess of five kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

MANNER AND MEANS OF THE CONSPIRACY

1. It was part of the conspiracy that coconspirator Mario Luis Rojas, Jr., charged elsewhere, was a leader and organizer of a cocaine distribution enterprise which trafficked in kilogram quantities of cocaine and that defendants **MAURICIO ROJAS, JORGE ALDEA, NAYDIA ROJAS** and **MARILYN ROJAS**, and other persons known and unknown to the grand jury, including, but not limited to AC, HS, FM, and WC, were all members of the enterprise.

It was further part of the conspiracy that:

2. Coconspirator Mario Luis Rojas, Jr. ordered and obtained kilogram quantities of cocaine from sources located in, among other places, New York, for delivery to the Philadelphia, Pennsylvania area, where Mario Luis Rojas, Jr. and other members of the enterprise distributed the cocaine.

3. Coconspirator Mario Luis Rojas, Jr. transported and caused to be transported money related to the enterprise's cocaine trafficking.

4. Coconspirator Mario Luis Rojas, Jr. maintained and caused to be maintained properties for the purpose of storing the enterprise's cocaine.

5. Defendants **MAURICIO ROJAS, JORGE ALDEA, NAYDIA ROJAS** and **MARILYN ROJAS** picked up cocaine ordered by coconspirator Mario Luis Rojas, Jr. from his sources and transported the cocaine back to Philadelphia.

6. Defendants **MAURICIO ROJAS** and **JORGE ALDEA** delivered cocaine to customers of the enterprise.

7. Defendants **MAURICIO ROJAS, NAYDIA ROJAS** and **MARILYN**

ROJAS helped transport money related to the enterprise's cocaine trafficking.

8. Defendant **MAURICIO ROJAS** helped arrange for others to protect cocaine stored in stash houses in Philadelphia.

OVERT ACTS

In furtherance of the conspiracy, and in order to accomplish its object, the following overt acts, among others, were performed by the defendants and others in the Eastern District of Pennsylvania and elsewhere:

1. In or about the fall of 1995, at the direction of coconspirator Mario Luis Rojas, Jr., AC traveled to Chicago, Illinois, for the purpose of picking up money both knew to be related to the cocaine trafficking enterprise, and transporting it back to Philadelphia, Pennsylvania.

2. In or about the fall of 1995, at the direction of coconspirator Mario Luis Rojas, Jr., defendant **NAYDIA ROJAS** and HS traveled to Chicago to assist AC with transporting the money referred to above in Paragraph 1, and transported from Chicago to Philadelphia between approximately \$500,000 and \$1,000,000 in United States currency, hidden in body suits.

3. On or about October 31, 1995, at the direction of coconspirator Mario Luis Rojas, Jr., defendant **NAYDIA ROJAS** and AC traveled to Los Angeles, California, for the purpose of picking up money they knew to be related to the cocaine trafficking enterprise and transporting it back to Philadelphia, Pennsylvania, and transported from Los Angeles to Philadelphia approximately \$300,000 in United States currency hidden in a body suit, and another approximately \$200,000 in United States currency, contained in two suitcases.

4. In or about the fall of 1996, coconspirator Mario Luis Rojas, Jr. ordered approximately 50 kilograms of cocaine from a source located in New York. Defendants **MAURICIO ROJAS** and **MARILYN ROJAS** and HS traveled to New York, where they obtained approximately 50 kilograms of cocaine, which they drove back to Philadelphia and delivered to coconspirator Mario Luis Rojas, Jr.

5. In or about the winter of 1996-1997, at the direction of coconspirator Mario Luis Rojas, Jr., HS rented a house at 4740 Marple Street, Philadelphia, for the purpose of storing cocaine.

6. In or about the summer of 1997, coconspirator Mario Luis Rojas, Jr., defendant **JORGE ALDEA** and HS took delivery of a shipment of approximately 300 kilograms of cocaine which coconspirator Mario Luis Rojas, Jr. had ordered from a source in New York. Defendant **JORGE ALDEA** and HS transported the cocaine to 4740 Marple Street, where they stored the cocaine until it was distributed over several weeks to several customers of the enterprise, including AC.

7. In or about the fall of 1997, at the direction of coconspirator Mario Luis Rojas, Jr., HS rented a house at 7614 Brocklehurst Street, Philadelphia, Pennsylvania, in order to store cocaine.

8. In or about the fall of 1997, coconspirator Mario Luis Rojas, Jr. ordered another shipment of cocaine, and defendant **JORGE ALDEA** and HS took delivery of a shipment of approximately 351 kilograms of cocaine and stored it in the house at 7614 Brocklehurst Street.

9. In or about November of 1997, defendant **MAURICIO ROJAS** and HS delivered to AC approximately 100 kilograms of the 351 kilogram shipment referred to above in Paragraph 8. The distribution was recorded in drug ledgers maintained for the enterprise by FM and kept at the residence of coconspirator Mario Luis Rojas, Jr.

10. In or about November of 1997, coconspirator Mario Luis Rojas, Jr. ordered the murder of FM because coconspirator Mario Luis Rojas, Jr. thought FM was stealing from the enterprise.

11. On or about November 17, 1997, HS, acting at the direction of coconspirator Mario Luis Rojas, Jr., fired two bullets from a .25 handgun into the head of FM, who was permanently injured, but survived.

12. On or about September 1, 1998, at 9024 Convent Street, Philadelphia, Pennsylvania, coconspirator Mario Luis Rojas, Jr. possessed with the intent to distribute approximately 104 kilograms of cocaine, for which he was arrested by the Pennsylvania State Police.

13. Between on or about September 1, 1998 and on or about September 12, 1998, defendant **NAYDIA ROJAS** and AC requested WC to assist the escape of Mario Luis Rojas, Jr. from the custody of the Pennsylvania State Police.

14. On or about September 12, 1998, coconspirator Mario Luis Rojas, Jr. escaped from the custody of the Pennsylvania State Police after offering a large sum of money to a Pennsylvania State Trooper, who assisted the escape.

15. On or about September 12, 1998, defendants **MAURICIO ROJAS** and **NAYDIA ROJAS** and AC assisted coconspirator Mario Luis Rojas, Jr. when he fled the United States of America to Mexico after his escape.

16. In or about the winter of 1998-1999, at the direction of coconspirator Mario Luis Rojas, Jr., who was at that time a fugitive living in Mexico, AC obtained a vehicle which was delivered to Mario Luis Rojas, Jr., in Mexico for the purpose of transporting money intended to facilitate the continuation of Mario Luis Rojas, Jr.'s cocaine distribution enterprise from and in Mexico.

17. In or about 1999, but after February 3, 1999, defendants **NAYDIA ROJAS** and **MARILYN ROJAS** and WC traveled to New York to obtain approximately 20 kilograms of cocaine.

18. In or about 1999, but after February 3, 1999, defendant **NAYDIA ROJAS** spoke by telephone with Mario Luis Rojas, Jr. in Mexico to complain about the quality of the cocaine obtained in New York.

All in violation of Title 21, United States Code, Section 846.

NOTICE OF FORFEITURE

As a result of the violation of Title 21, United States Code, Section 846 set forth in Count One of this Indictment, the defendants

**MAURICIO ROJAS,
a/k/a Maurice Rojas, and
JORGE ALDEA,
a/k/a “Fat George”
NAYDIA ROJAS, and
MARILYN ROJAS**

shall forfeit to the United States:

(A) Any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violation of Title 21, United States Code, as charged in this Indictment.

(B) Any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of the violation of Title 21, United States Code as charged in this Indictment.

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants;

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value, or

- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of said property listed above as being subject to forfeiture.

All in violation of Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney